

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

PAUL M. JONES,

Plaintiff,

v.

BANK OF NEW YORK, et al.,

Defendants.

Civil Action No. 1:12-CV-11503-RWZ

**MOTION FOR EXTENSION OF TIME IN WHICH TO ANSWER  
OR OTHERWISE RESPOND TO COMPLAINT**

Defendants Bank of New York, Trustee for the Certificate Holders, CWABS, Inc., Asset-Backed Certificates, Series 2004-7 (“BNY Mellon”), Ann Marie Cassano, Leon Daniels, Paul Connolly, Stephanie Whited, Bank of America Home Loans Servicing, L.P. (“BANA”),<sup>1</sup> Mortgage Electronic Registration Systems, Inc. (“MERS”), Tiffany Skaife, Sandra J. Robinson, Amanda Farrar and Mark Bishop (collectively, “Defendants”) hereby move for an extension of time to and including December 6, 2012 for answering or otherwise responding to the First Amended Complaint (“Complaint”) of *pro se* Plaintiff, Paul M. Jones (“Plaintiff”) in this case. In support of this motion, Defendants state as follows:

1. The Plaintiff charges BNY Mellon, BANA, employees and agents of BNY Mellon, employees and agents of BANA, and the lawyers who have represented them with alleged misconduct in connection with efforts to foreclose Plaintiff’s mortgage.

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<sup>1</sup> Please take notice that effective July 1, 2011, BAC Home Loans Servicing, LP has been merged into Bank of America, N.A. It will now be known as “Bank of America, N.A., successor by merger to BAC Home Loans Servicing, LP.”

2. As of this filing, BNY Mellon, BANA, and a majority of the individually-named Defendants have not been served in this matter. Defendants' counsel is in the process of informing Plaintiff that service will be accepted on behalf of each of the undersigned Defendants who have not yet been served as of the time of this filing.

3. The resources of this Court and the interests of judicial economy will be better served if the undersigned Defendants are able to collectively respond to the Complaint on single date certain.

**WHEREFORE**, the undersigned Defendants respectfully request an extension of time to and including December 6, 2012 within which they shall answer or otherwise respond to Plaintiff's Complaint.

**BANK OF NEW YORK MELLON, ANN  
MARIE CASSANO, LEON DANIELS,  
PAUL CONNOLLY, STEPHANIE  
WHITED, BANK OF AMERICA HOME  
LOANS SERVICING, L.P., MORTGAGE  
ELECTRONIC REGISTRATION  
SYSTEMS, INC., TIFFANY SKAIFE,  
SANDRA J. ROBINSON, AMANDA  
FARRAR AND MARK BISHOP,**

By their attorneys,

Dated: November 13, 2012

/s/ Neil D. Raphael

Neil D. Raphael (BBO# 650453)

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**LOCAL RULE 7.1(A)(2) CERTIFICATION**

I, Janet E. Taylor, hereby certify that on November 13, 2012, I attempted to confer with Paul M. Jones, *pro se*, in an effort to notify him of my intention to file the foregoing motion by telephoning Mr. Jones at the number provided in the pleadings. At the time of filing this motion, I was unable to reach him directly but have left him a voicemail.

/s/ Janet E. Taylor

Janet E. Taylor

**CERTIFICATE OF SERVICE**

The undersigned understands that the following counsel of record are registered on the Court's CM/ECF database. As a result, these individuals (1) will receive from the Court electronic notification of the filing of the *Motion for Extension of Time in Which to Answer or Otherwise Respond to Complaint*, filed via ECF on November 13, 2012; (2) have access to this document through the Court's website; and (3) will not receive paper copies of the foregoing from the undersigned upon filing.

Walter H. Porr, Jr. - [wporr@acdlaw.com](mailto:wporr@acdlaw.com)

Henry C. Dinger - [HDinger@GoodwinProcter.com](mailto:HDinger@GoodwinProcter.com)

I further certify that on November 13, 2012, a true copy of the foregoing *Motion for Extension of Time in Which to Answer or Otherwise Respond to Complaint* was served by first-class mail, postage prepaid upon Paul M. Jones, *pro se*, 572 Park Street, Stoughton, MA 02072.

/s/ Neil D. Raphael

Neil D. Raphael